

EXHIBIT A

Goodchild Declaration

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Emergent Fidelity Technologies Ltd,

Debtor.¹

)

) Chapter 11

)

) Case No. 23-10149 (JTD)

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**DECLARATION OF JOHN C. GOODCHILD, III
IN SUPPORT OF DEBTOR'S RESPONSE TO BLOCKFI'S MOTION TO DISMISS**

John C. Goodchild, III, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury as follows:

1. I am over 18 years of age and competent to testify to the matters herein.

2. I am a partner at the law firm Morgan, Lewis & Bockius LLP ("Morgan Lewis") with offices located at 1701 Market Street, Philadelphia, PA 19103. I am in good standing before the courts in which I am admitted, and I have not been disbarred, suspended or disciplined by any court or administrative body.

3. I am authorized to submit this declaration (the "Declaration") on behalf of the Debtor. The information contained in this Declaration is based on my personal knowledge or is derived from discussions with the JPLs (defined below) and/or my review of the files related to this chapter 11 case (the "Chapter 11 Case"). I submit this Declaration in support of the *Debtor's Response to BlockFi's Motion to Dismiss*, filed contemporaneously herewith and incorporated herein by reference.

¹ The Debtor in this Chapter 11 case is Emergent Fidelity Technologies Ltd, a company formed under the laws of Antigua and Barbuda with registration number 17532 as identified by the Antigua and Barbuda Financial Services Regulatory Commission. The Debtor's principal place of business is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

4. The Debtor is a company formed under the laws of Antigua and Barbuda. The Debtor is under the control of Angela Barkhouse and Toni Shukla as the Joint Provisional Liquidators (the “JPLs”) pursuant to the Appointment Order² of the Eastern Caribbean Supreme Court, High Court of Justice, Antigua and Barbuda, dated December 5, 2022.

5. As the Court is aware, certain assets of the Debtor have been seized by the United States in connection with the criminal prosecution of the Debtor’s majority equity holder, Samuel Bankman-Fried. Prior to the filing of the Debtor’s bankruptcy petition, I contacted representatives of the United States Department of Justice (the “DOJ”) and informed them of the impending filing and the relief sought by the Debtor. The Debtor continues to discuss with the DOJ the interplay between the Debtor’s Chapter 11 Case and the criminal prosecution of Mr. Bankman-Fried.

6. Prior to commencement of this case, a retainer to cover future work on behalf of the Debtor was paid on the Debtor’s behalf to Morgan Lewis. Morgan Lewis has held this retainer in a bank account in the U.S. As of the commencement of this case, the unused amount of that retainer was \$320,477.60.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 2, 2023
Philadelphia, Pennsylvania

Respectfully submitted,

/s/ John C. Goodchild, III
John C. Goodchild, III

² The Appointment Order is attached as Exhibit B to the *Declaration of Angela Barkhouse in Support of the Debtor’s Chapter 11 Petition* [D.I. 3].